

1 Montgomery Y. Paek, Esq.
2 Nevada Bar No. 10176
3 Amy L. Thompson, Esq.
4 Nevada Bar No. 11907
5 Andrew S. Clark, Esq.
6 Nevada Bar No. 14854
7 LITTLER MENDELSON, P.C.
8 3960 Howard Hughes Parkway
9 Suite 300
10 Las Vegas, Nevada 89169.5937
11 Telephone: 702.862.8800
12 Fax No.: 702.862.8811
13 mpaek@littler.com
14 athompson@littler.com
15 asclark@littler.com

16 Attorneys for Defendant
17 HILTON RESORTS CORPORATION

18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 JULIE GALVEZ, on behalf of herself and all
21 others similarly situated,

22 Plaintiff

23 v.

24 HILTON RESORTS CORPORATION; and
25 DOES 1 through 50, inclusive

26 Defendant

Case No. 2:24-cv-02147-CDS-BNW

**STIPULATION AND ORDER TO
STAY PROCEEDINGS**

[THIRD REQUEST]

[ECF No. 19]

27 Plaintiff Julie Galvez and Defendant Hilton Resorts Corporation hereby agree and stipulate
28 and agree to stay all proceedings in this matter for 85 days, up to and including **December 10,**
and agree to stay all proceedings in this matter for 85 days, up to and including **December 10,**
2025, to allow the parties to participate in a private mediation in this matter. Since the parties' last
request to stay proceedings, they have agreed to continue the mediation in this matter to December
10, 2025, to allow additional time to exchange extensive pay and time records for the putative class
and collective before mediation. The requested stay would include all current deadlines, including
the current deadline for Defendant to file a response to Plaintiff's First Amended Complaint (ECF
No. 8) and the deadline for the Parties to file a Joint Discovery Plan and Scheduling Order.

1 The purpose of this stipulation is to promote judicial economy and permit this Court to
 2 effectively control the disposition of cases on its docket with economy of time and effort for itself,
 3 counsel, and the litigants. *See Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936) (“[T]he power to
 4 stay proceedings is incidental to the power inherent in every court to control the dispositions of the
 5 causes on its docket with economy of time and effort for itself, for counsel, and for litigants.”);
 6 *Pate v. DePay Orthopedics, Inc.*, No. 2:12-cv-01168-MMD-CWH, 2012 WL 3532780, *2 (D. Nev.
 7 Aug. 14, 2012) (“A trial court may, with propriety, find it is efficient for its own docket and the
 8 fairest course for the parties to enter a stay of an action before it, pending resolution of independent
 9 proceedings which bear upon the case.”) (internal citations omitted). In evaluating whether to stay
 10 proceedings, the Court considers the competing interests of the parties and of the Court, including
 11 “possible damage which may result in granting the stay, the hardship or inequity which a party
 12 may suffer in being required to go forward, and the orderly course of justice measured in terms of
 13 simplifying or complicating of issues, proof, and questions of law which could expected to result
 14 from a stay.” *Coker v. Dowd*, No. 2:13-cv-0994-JCM-NJK, 2013 WL 12216682, *1 (D. Nev. Jul.
 15 8, 2013) (granting joint motion to stay all proceedings pending mediation), quoting *Lockyer v.*
 16 *Mirant Corp.*, 398 F.3d 1098, 1110 (9th Cir. 2005).

17 The Parties have scheduled a private mediation in this matter for December 10, 2025, and
 18 are therefore actively exploring alternative dispute resolution to potentially resolve this litigation
 19 entirely. As this is a putative class action, such exploration is more complex and time consuming.
 20 The Parties believe that, through their efforts, they may be able to resolve the matter and avoid
 21 unnecessary litigation costs and the unnecessary use of judicial resources.

22 Based on the foregoing, the Parties agree that their interests are aligned in seeking to
 23 potentially resolve this matter entirely without expending unnecessary litigation costs and efforts,
 24 and that neither Plaintiff nor Defendant will be prejudiced by a stay of the proceedings. The Parties
 25 also agree that they will each suffer an avoidable hardship – time and money spent litigating – if
 26 the matter is required to proceed at this stage considering the Parties’ agreement to explore a
 27 potential resolution. Lastly, the Parties respectfully submit that staying all proceedings will avoid
 28 expending judicial resources in the event that they simplify or entirely dispose of the issues in this

1 action. Accordingly, the Parties agree and stipulate that good cause exists to stay all proceedings
2 as requested herein.

3 The Parties will file a joint status report informing the Court of the outcome of their efforts
4 to resolve Plaintiff's claims within fourteen (14) days of the expiration of this stay:

5 1. Should the Parties reach a settlement of all claims, the Parties will update the Court
6 as to the tentative resolution and set forth a proposed briefing schedule for settlement approval; or

7 2. Should the Parties be unsuccessful at resolving all claims, the Parties shall inform
8 the Court which, if any, claims were not resolved and propose a scheduling order for the matter to
9 proceed, including for Defendant's response to the Plaintiff's First Amended Complaint, issuance
10 of a putative class list, and notification to the putative collective.

11 This stipulation is submitted in good faith to allow the parties to potentially resolve the
12 matter entirely and is not for the purpose of causing any undue delay. This is the third request to
13 stay this case.

14 Dated: September 12, 2025

Dated: September 12, 2025

15 Respectfully submitted,

Respectfully submitted,

16 /s/ Leah L. Jones

/s/ Andrew S. Clark

17 Joshua D. Buck, Esq.
18 Leah L. Jones, Esq.
19 THIERMAN BUCK

Montgomery Y. Paek, Esq.
Amy L. Thompson, Esq.
Andrew S. Clark, Esq.
LITTLER MENDELSON, P.C.

20 Attorneys for Plaintiff
21 JULIE GALVEZ

Attorney for Defendant
HILTON RESORTS CORPORATION

22 **IT IS SO ORDERED.**

23
24
25
26 UNITED STATES DISTRICT JUDGE

27 Dated: September 12, 2025